Review of Grumman Naval Facility (NWIRP) Remedial Investigation &
Alternative Selection

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The purpose of this memorandum is to set forth comments regarding
proposed soil remedial activity at the Naval Weapons Industrial
Reserve Plant (NWIRP) located in Bethpage, NY. I have briefly
reviewed the Proposed Remedial Action Plan for Sites 1, 2 & 3
dated October 28, 1995.

Preliminary selection of a remedial alternative(s) is based on
information generated during the Remedial Investigation (RI).
Detailed information necessary to evaluate whether some of the
proposed activity will actually work (e.g., the extent to which
on-site soils are amenable to vapor extraction) will be generated
during the Remedial Design stage. The following comments should
Does not provide CMS provide more data? be considered in light of the limited data regarding the efficacy
and applicability of some of the proposed technology.

Response: Decisions regarding the potential extent of metals excavation
should not be based on TCLP criteria as is indicated on Figure 11
The TCLP (see also page 28). More sophisticated modelling regarding
is more stringent metals fate and transport and the potential leaching of residual
than other metals contamination based on soil concentrations levels should
methods. be conducted and used to determine appropriate action levels.
The action The TCLP procedure is designed to determine whether something is
level a hazardous waste and it is not an acceptable means of
numbers are a lot more stringent than NYSDEC TAGM values. For this reason, we allowed the Navy to use TCLP. determining potential leachability in the field!

What type of b is information for he looking (A) Similarly, additional information regarding the extent to which
residual VOC concentrations are "not expected" to leach to
groundwater should also be provided. Especially since the
proposed remedial alternative would simply treat soils
contaminated with VOCs in place using vapor extraction.
(B) Moreover, it is unclear whether sufficient characterization of
soils has been conducted in order to determine whether vapor
extraction will remove significant volumes of VOCs from soils
and/or achieve applicable criteria. Selected removal of VOC
(C) "hot-spots" should be considered as well as other forms of
treatment in the event that the proposed method does not achieve
remedial goals in a sufficiently expeditious manner. Finally, it
is important to coordinate future groundwater remediation and
monitoring activity (Operable Unit 2) with vadose zone
will be remediation. (d) The best means of determining whether soil
G.W. will be remediation has fully addressed residual migration of
is regularly contaminants from soil to groundwater is to monitor changes in
reference to this, and groundwater quality over time. *ans: G.W. will be remediated and monitored over time.*
See and it to John N.

During the design phase it is imperative that VOC emissions be addressed. How will VOCs be captured/treated during vapor extraction and the proposed air-stripping of Bethpage Water District's public water supply well #5 (assuming air-stripping is selected over GAC, see page 19)?

~ p.18 of ROD for public water supply well; p.27 of ROD for SVE → on-site VOCs from on-site vented would be treated.

The practice of "isolating" PCB-contaminated soil by covering it with 8-10 inches of uncontaminated soils may reduce potential exposure and hence risk c_____ons (see page 15, section 4.3). ← [p.14 of ROD]
However, implementing suc[h] _____ does not address the root of the problem and m_____ plicate eventual excavation and clean-up.

Ans: This already has been done at other assessments

____nt to protect workers while ____ Site 1.

targeted for removal

That currently appear at the surface.

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Q for John N:
How would it "significantly complicate" eventual excavation, if it's only 8 to 10 inches of topsoil?